



Oregon

Kate Brown, Governor

Department of Environmental Quality

Northwest Region Portland Office

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August 21, 2017

Deborah A. Edwards
ExxonMobil Environmental Services Company
2800 Decker Drive
Baytown, Texas 77520

Re: ExxonMobil Letters on NW Natural Gasco Site - ECSI #84

Dear Ms. Edwards:

Director Whitman has asked me to respond to your June and July 2017 letters to the Oregon Department of Environmental Quality (DEQ). I am DEQ's Source Control lead for Portland Harbor and have been working closely with DEQ's upland site project managers, DEQ management, the U.S. Environmental Protection Agency (EPA), Tribes and others to ensure the effective alignment of the upland sites with EPA's in-water remedy. I am very familiar with the sites identified in your June 20, 2017 document titled "Letter from ExxonMobil Forwarding Data and Report" including the Gasco site.

In your submittals to DEQ, ExxonMobil expresses concern that the NW Natural "Gasco" site is an apparent ongoing source of contaminants to the Willamette River, and that controlling the Gasco source is critical to achieving the remedial goals for the Willamette River established in EPA's Record of Decision for Portland Harbor. DEQ agrees that the impacted sediments in the river at the Gasco site are a significant active source of contamination to the Willamette River. This is the basis for identifying the Gasco site in Director Whitman's June 14, 2017, letter to EPA administrator Pruitt as one of five Portland Harbor high priority sediment management areas that should initiate remedial design by the end of 2017.

As the lead agency for upland source control, DEQ works closely with NW Natural, EPA and our partners to plan, design, and implement the upland source control program for the Gasco site. The primary focus of this program is the design and construction of the remaining source control elements to augment the groundwater hydraulic containment and control system already in place. These elements include integrating the riverbank into the design and construction of the sediment remedy; implementing any needed stormwater measures; and construction and operation of a shallow groundwater source control measure that, in combination with the existing system, will hydraulically prevent most uplands groundwater from reaching the river.

ExxonMobil also suggests that there are significant ongoing stormwater sources, control of which is critical to the success of the Portland Harbor sediment remedy. DEQ notes that ExxonMobil's

analysis uses stormwater data collected in 2007-2008, during the Portland Harbor remedial investigation (RI). This analysis does not consider substantial progress toward evaluating and controlling stormwater sources made in the decade since collection of the RI data. DEQ refers you to the March 2016 Portland Harbor Upland Source Summary Report for a more up to date overview of the status of stormwater source control measures and planned effectiveness monitoring and loading/recontamination analyses.

DEQ acknowledges ExxonMobil's concerns regarding the Gasco site and stormwater source control, but we are confident that the in-water design and review process will anticipate and address these concerns. The in-water design process for all Portland Harbor sediment management areas includes additional delineation work to refine the remedial action project area and a review of source control measures to confirm that these measures are sufficient to prevent sediment remedy recontamination.

I would be happy to meet with ExxonMobil and other interested parties, including representatives from BP who have raised similar concerns, to discuss the status of DEQ's source control work within the Portland Harbor. This meeting will be coordinated with EPA, who I understand is already planning to meet with you. I can be reached at (503) 229-5538 or mcclincy.matt@deq.state.or.us.

Sincerely,

Matt McClincy
Project Manager
Northwest Region Cleanup Program

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Michelle Rosenthal, counsel for Brix Maritime Co.
Gary Gengel, counsel for Toyota Motor Sales U.S.A., Inc.
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